

Matter 2
Representor reference: 1129



Oxford – Development and Planning

269 Banbury Road
Oxford
OX2 7LL
Telephone 01865 366660
Facsimile 01865 554059

oxford@struttandparker.com
www.struttandparker.com

**Wycombe District Local Plan
Statement for Matter 2 – The Plan’s Strategy**

**By Strutt & Parker
On behalf of IM Land
Land at Berwick Road, Marlow**

Introduction

1. This hearing statement has been prepared by Strutt & Parker on behalf of IM Land, who have residential development interests in two sites on the edge of Marlow: Land at Seymour Court Road and Land at Berwick Road. This statement relates to Land at Berwick Road.
2. The site was promoted to the Council in response to consultation on the draft Local Plan, and is capable of accommodating 30-40 dwellings on part of the site in a sustainable location on the edge of the built up area of Marlow.
3. This statement responds to the Inspector's Matter 2: The Plan's strategy, due to be discussed at the hearing sessions on 17th July 2018.

3. Is the Plan's Spatial Strategy (Policy CP2) consistent with the requirement of the NPPF to promote sustainable development

1. IM Land does not consider Policy CP2 to be consistent with the NPPF on the basis that the Policy reflects the constraints led approach to the Plan which starts from a position that AONB and Green Belt constraints cannot be outweighed by development needs. The approach to the Plan is then reflected in the site selection process, which is considered to be flawed. The Council's process did not assess all sites in a consistent and transparent manner. Indeed, the Council's process removed planning judgement from the exercise by screening out Green Belt and AONB sites considered to be major development early in the process thereby not allowing the locational benefits of sites to be assessed against potential harm to the AONB or Green Belt.
2. The Council has taken the highly irregular action of producing new evidence in support of its site selection process subsequent to its Regulation 19 consultation. Page 115 of the Statement of Consultation (**WDLP10**) states that in response to objections regarding both previously assessed sites and newly promoted sites at Regulation 19 it has reviewed these sites '*as appropriate according to their location*' and published this new evidence in Appendix 21 (**WDLP10.21**).
3. Page 115 also states that '*the conclusion reached is that none of the alternative sites or promotions would have been included in the emerging Local Plan.*' It also concludes that the strategic options considered as reasonable alternatives in the SA remained unchanged.
4. The Council did not consult on this new evidence and therefore stakeholders have not had the opportunity to comment on this site assessment. IM Land therefore query the status of this document within the examination library.
5. IM Land has reviewed Appendix 21 alongside the site assessment consulted on at Regulation 19 and found a number of anomalies in how sites have been

assessed in the Part 2 Green Belt Study (GB1.1) and the AONB Assessment (AONB1.1) versus sites assessed in Appendix 2.

6. Examples are set out below:

- The Council concluded that Sites ASH1 and ASH23 are not capable of removal from the Green Belt purely on the grounds that landscape mitigation would be required in order to create a readily identifiable boundary to the Green Belt. As a result, they are not considered further. However, the same conclusion was reached for Wycombe Air Park, which has been allocated for housing.
- The Council states that ASH14 scores moderately against NPPF Green Belt purposes, that its removal would be acceptable with regards to the general extent of the Green Belt and that the new Green Belt boundary would be permanent and robust. It then concludes that the site is not capable of removal from the Green Belt. The same conclusion was reached for Wycombe Air Park, which has been allocated for housing.
- Draft allocation RUR8, is a 7 hectare site allocated for 100 dwellings on the edge of the Tier 3 village of Stokenchurch, which is completely surrounded by AONB. The 2011 census stated that the built up area of Stokenchurch had 1,742 dwellings, therefore this allocation alone represents a 5.7% increase in the size of the village. This was not considered to be major development in the AONB by the Council, even with the cumulative impact of other allocations at this settlement, namely RUR9 for 28 dwellings and RUR10 for 2.9 hectares of employment. However, in its assessment of ASH23 in Appendix 21, which is on the edge of the Tier 2 settlement of Marlow and visually well contained, it considered 70 dwellings, representing less than 1.1% increase to that settlement as major development in the AONB.

7. In respect to the consideration of Land at Berwick Road, Marlow IM Land has the following observations on the Council's assessment.

8. The Council consider that this site's main contribution to the purposes of the Green Belt are in relation to safeguarding the countryside from encroachment and preventing urban sprawl. However, as a site of only 1.1 hectares and to be surrounded by development on three sides the score of 5 is considered to overstate this site's role in safeguarding the countryside.

9. The Council conclude that the removal of the site from the Green Belt is acceptable with regards to the general extent of the Green Belt. However, the site fails the Council's Green Belt test mainly because it assumes that the whole of the site would be developed, which does not take account of the Vision Document for this site, which proposes development only on part of the lower field, which is on lower ground and influenced by the settlement edge, with the remainder of the site becoming public open space and a strong landscape buffer.

10. However, the Council's assessment appears to disregard this information and in response to the question *'Is it appropriate to expand or reduce the site area to make it capable of removal from the Green Belt?'* the Council states that for Seymour Court Road *'There are no obvious alternatives to consider.'* In respect of Berwick Road the Council concludes *'The site abuts Local Plan site MR6 Seymour Court Road. However, amalgamating the two sites would not overcome the concerns so far identified.'*
11. Consequently, IM Land concludes that this additional evidence is also flawed with regard to the inconsistency and lack of rigor in the assessment of sites. It appears that the Council has attempted to post-rationalise its site selection decisions to avoid delay to the Plan's submission. By carrying out this additional site assessment work one can only conclude that the Council considered its original evidence base to be unsound.
12. IM Land consider the following elements of the policy to be unsound:
- 1. a.) i. the decision not to allocate sites that constitute major development in the AONB is not robustly or proportionately evidenced. IM Land submits that that the AONB Assessment and site selection process is fundamentally flawed
 - 1. B.) Whilst focusing development at Tiers 1 and 2 of the settlement hierarchy is logical the distribution of 85% of the housing requirement to these tiers is based on a flawed site assessment methodology.
13. IM Land's full objection to the evidence base underpinning the Spatial Strategy, Settlement Hierarchy and site selection is set out in its representations to Policies CP2 and CP3 of the draft Local Plan.

5. Has the Plan's Spatial Strategy been positively prepared, is it justified and will it be an effective mechanism for delivering growth over the Plan period?

a) Does the Plan's Spatial Strategy represent an effective approach to delivering sustainable development (Policy CP1) over the Plan period?

1. Policy CP1 states that the Plan will deliver sustainable development by delivering the vision and objectives and principles for the main places in the District.
2. Whilst Objective 6: Deliver Housing as set out on page 53 in respect of the Plan as a whole and page 154 in respect on Marlow and Policy CP2 superficially appear to be in support of delivering housing and directly housing growth to the most sustainable settlements in the District. However, this is inconsistent with Policy CP3 – Settlement Strategy, Policy CP4 Delivering Homes and the housing allocations, which allocates only 48 dwellings to the second largest settlement in the District, with Marlow only accommodating a total of 350 dwellings within the Plan period, equating to 2.7% of the OAN for Wycombe.

6. Has the Settlement Strategy (Policy CP3) been positively prepared, justified and will it be effective in delivering sustainable growth? a) How has the settlement hierarchy been defined and what level of growth is proposed for each tier?

1. IM Land do not consider that the Settlement Strategy has been positively prepared or justified and that it will not be effective in delivering sustainable growth. For the reasons set out in its representation to Policy CP3 of the draft Local Plan IM Land considers that the Settlement Strategy has been based on an unsound approach to the consideration of major development in the AONB and review of Green Belt boundaries.
2. Furthermore, IM Land do not consider that Policy CP3 will be effective in delivering sustainable growth as Marlow, the second largest settlement in the District, is only distributed 2.7% of the OAN, and as a result will only grow by 5.4%. IM Land believes that the Council has ruled out major development in the AONB and Green Belt release too early in its site selection process. Such sites were rejected without the Council assessing the benefits of allocating housing to where housing need is arising and where residents would have access to a good range of local facilities, employment opportunities and public transport routes against potential harm to the purposes of the Green Belt and the conservation of landscape and scenic beauty in the AONB.
3. Housing affordability as an issue to be addressed by the Local Plan, is significantly downplayed in the draft Local Plan in comparison to the AONB and Green Belt. The price of houses sold in Marlow in 2017 was £663,423, 24 times the national average wage. Only 83 affordable homes were delivered in 2014-15 across Wycombe District.
4. In the context of the Government's desire to widen opportunities for home ownership expressed in paragraph 50 of the NPPF, Paragraph 3.45 of the HEDNA Addendum (**HEDN2**) states that 'there is a clear income gap between being able to afford market rent and being able to afford home ownership in all of the local authority areas, though this is particularly the case when considering 2-bed housing.'
5. In Wycombe District, a household needs an income of £31,000 to rent a two-bed dwelling, but £61,600 to buy a second hand two bed home (worth on average £236,775) and £80,400 to buy a new two bed home (worth on average £309,540). The HEDNA, however doesn't take into account housing availability. In Marlow, of the 411 dwellings sold in Marlow in the last 18 months (according to the HM Land Registry UK House Price Index), only 5 properties sold for under £236,775 and only 36 properties had a sale price of under £310,000. There is clearly a shortage of affordable property to buy in Marlow, when compared against Wycombe as a whole. IM Land consider that addressing the issue of housing affordability in Marlow should have been given greater consideration.
6. IM Land's view is therefore that the Council should have at least identified housing affordability as an issue and objective to be addressed by the Local

Plan and allowed itself to make planning judgements in its site assessment methodology.

7. In contrast, 19% of housing numbers are distributed to Princes Risborough, resulting in a 59% increase in the size of that Tier 2 settlement. Finally, the two allocations at Stokenchurch represent a 7.4% increase in the size of this Tier 3 settlement.